

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA  
Plaintiff,

v.

DEWIN SANCHEZ SERRANO  
Defendant.

Criminal no. 19-192 (DRD)

**Motion to request Mr. Sánchez Serrano at Status Conference via VTC**

To the Honorable Court:

Comes now the defendant, Mr. Sánchez Serrano, and respectfully states and prays as follows:

1. On November 19, 2021, the parties informed than they have reach an agreement in principle that would resolve the current matter, but that it was prudent to address the progress of the negotiations before the Court. (*See* Docket Entry #42)
2. As requested, the Court has set a status conference for December 6, 2021, via VTC, at 11:30 am. (*See* Docket Entries #43, 44)
3. The undersigned has been unsuccessful in his attempts to meet with Mr. Sánchez Serrano at MDC to discuss in detail the current status of the plea negotiations. The latest attempt was just this past Wednesday, December 1, 2021.
4. Since it is crucial that Mr. Sánchez Serrano is informed of the current state of negotiations, and to ensure that we do not continue to pursue a resolution that is not acceptable to him, it is necessary that he be made available at the status conference, and that the undersigned be provided an opportunity to discuss the status of the plea negotiations 15 minutes prior to the status conference time.
5. After this conversation happens, the undersigned will then inform the Court and the government of Mr. Serrano Sanchez's intentions.

**WHEREFORE**, due to the necessity of establishing an urgent line of communications with Mr. Sánchez Serrano, it is requested that he be ordered to appear at the Status Conference scheduled for December 6, 2021, at 11:30 am via VTC.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 3<sup>rd</sup> day of December 2021.

**I HEREBY CERTIFY**, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

*s/ Diego H. Alcalá Laboy*

Diego H. Alcalá Laboy

PO Box 12247

Tel.: (787) 432-4910

USDC-PR No. 300504

[dalcala@defensorialegal.com](mailto:dalcala@defensorialegal.com)